

JAP:AFM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

REMOVAL TO THE
NORTHERN DISTRICT
OF NEW YORK

-against-

Fed. R. Crim. P. 5

MICHAEL SKINNER,

No. 17-M-924

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

ERIC M. TYLER, being duly sworn, deposes and says that he is a Special Agent with the Drug Enforcement Administration (the "DEA") duly appointed according to law and acting as such.

Upon information and belief, on October 18, 2017, a grand jury issued an indictment charging MICHAEL WRIGHT and others with conspiracy to possess heroin and fentanyl with the intent to distribute in violation of Title 21, United States Code, Section 846.

On that same day, the Honorable Andrew T. Baxter, United States Magistrate Judge in the Northern District of New York, issued a warrant for the defendant's arrest. The source of your deponent's information and the grounds for his belief are as follows:

1. I have been a Special Agent with the DEA for approximately seven years and am currently assigned to the Southern District of New York.

2. On October 18, 2017, a criminal indictment was filed in the United States District Court for the Northern District of New York charging the defendant with

conspiracy to possess heroin and fentanyl with the intent to distribute in violation of Title 21, United States Code, Section 846 and being a felon in possession of a firearm in violation of Title 18, United States Code, Section 922(g), among other charges. A copy of the indictment is attached hereto as Attachment A.

3. On that same date, an arrest warrant was issued by the United States District Court for the Northern District of New York. A copy of the warrant is attached hereto as Attachment B.

4. On October 24, 2017, law enforcement agents conducting surveillance near SKINNER's home observed a person who appeared to be SKINNER getting into a vehicle that investigators had previously identified as belonging to SKINNER and his co-defendant SUSY GONZALEZ. Agents followed the vehicle and pulled it over near 102-20 Atlantic Avenue in Queens, New York.

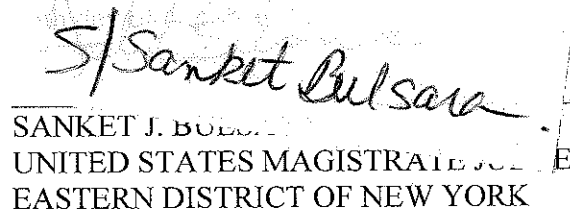
5. At the time of his arrest, the defendant was searched and found to be in possession of a driver's license in the name of "Michael Skinner." SKINNER's fingerprints were processed after his arrest and were electronically matched to preexisting records regarding SKINNER in law enforcement databases. The defendant appears identical to preexisting photographs of SKINNER that I have reviewed in connection with this investigation.

WHEREFORE your deponent respectfully requests that the defendant
MICHAEL SKINNER be removed to the Northern District of New York so that he may be
dealt with according to law.

A handwritten signature in black ink, appearing to read "Eric M. Tyler", written over a horizontal line.

ERIC M. TYLER
SPECIAL AGENT
DRUG ENFORCEMENT ADMINISTRATION

to before me this

A handwritten signature in black ink, appearing to read "S/Sanket Budes", written over a horizontal line.

SANKET J. BUDS
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

ATTACHMENT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MICHAEL M. WRIGHT,
MICHAEL SKINNER, a/k/a P,
JEFFREY MCALLISTER, a/k/a Lex,
a/k/a L,
CRAIG MOORE,
CURTIS JAMISON, and
SUSY GONZALEZ

) Criminal No. 5:17-CR-323

) Indictment

) Violations: 21 U.S.C. § 846
) [Conspiracy to Possess with
) Intent to Distribute and to
) Distribute Heroin, Furanyl
) Fentanyl, and Controlled
) Substance Analogues]

) 21 U.S.C. § 841(a)(1)
) [Possession with Intent to
) Distribute Furanyl Fentanyl
) and Controlled Substance
) Analogues]

) 21 U.S.C. §§ 841(a)(1) and
) 846
) [Attempted Possession with
) Intent to Distribute Heroin]

) 18 U.S.C. § 922(g)
) [Felon in Possession of a
) Firearm]

) 7 Counts and Forfeiture Allegation

Defendants.

) County of Offense: Onondaga

THE GRAND JURY CHARGES:

COUNT 1

[Heroin, Furanyl Fentanyl, and Controlled Substance Analogue Conspiracy]

From on or about January 1, 2016, through on or about February 16, 2017, in Onondaga

County in the Northern District of New York, and elsewhere,

**MICHAEL WRIGHT,
MICHAEL SKINNER, a/k/a P,
JEFFREY MCALLISTER, a/k/a Lex,**

**CRAIG MOORE, and
CURTIS JAMISON,**

and others conspired to knowingly and intentionally distribute and possess with intent to distribute: a) controlled substances; and b) controlled substance analogues, as defined in Title 21, United States Code, Section 802(32), with intent that the controlled substance analogue be used for human consumption, as provided in Title 21, United States Code, Section 813, all in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

As to defendants **MICHAEL WRIGHT, MICHAEL SKINNER, a/k/a P,** and **JEFFREY MCALLISTER, a/k/a Lex, a/k/a L,** that violation involved one (1) kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A), 100 grams or more of a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I controlled substance and an analogue of N-Phenyl-N-[1-(2-Phenylethyl)-4-Piperidinyl] Propanamide, in violation of Title 21, United States Code, Section 841(b)(1)(A), and N-ethylpentylone hydrochloride, a controlled substance analogue, in violation of Title 21, United States Code, Section 841(b)(1)(C).

As to defendants **CRAIG MOORE, and CURTIS JAMISON,** that violation involved 100 or more grams of mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B), 10 grams or more of a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I controlled substance and an analogue of N-Phenyl-N-[1-(2-Phenylethyl)-4-Piperidinyl] Propanamide, in violation of Title 21, United States Code, Section 841(b)(1)(B), and N-ethylpentylone hydrochloride, a controlled substance analogue, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 2

[Possession with Intent to Distribute Furanyl Fentanyl]

On or about January 14, 2017, in Onondaga County, in the Northern District of New York, the defendants,

**MICHAEL SKINNER, a/k/a P, and
SUSY GONZALEZ,**

acting together and aiding and abetting each other, knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved 100 grams or more of a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I controlled substance and an analogue of N-Phenyl-N-[1-(2-Phenylethyl)-4-Piperidinyl] Propanamide, in violation of Title 21, United States Code, Section 841(b)(1)(A) and Title 18, United States Code, Section 2. .

COUNT 3

[Possession with Intent to Distribute Furanyl Fentanyl]

On or about February 16, 2017, in Onondaga County, in the Northern District of New York, the defendant, **CRAIG MOORE**, knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I controlled substance and an analogue of N-Phenyl-N-[1-(2-Phenylethyl)-4-Piperidinyl] Propanamide, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 4

[Possession with Intent to Distribute Furanyl Fentanyl]

On or about February 16, 2017, in Onondaga County, in the Northern District of New York, the defendant, **CURTIS JAMISON**, knowingly and intentionally possessed with intent to

distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved a mixture and substance containing a detectable amount of furanyl fentanyl, a Schedule I controlled substance and an analogue of N-Phenyl-N-[1-(2-Phenylethyl)-4-Piperidinyl] Propanamide, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 5

[Possession with Intent to Distribute a Controlled Substance Analogue]

On or about February 16, 2017, in Onondaga County, in the Northern District of New York, the defendant, **CURTIS JAMISON**, knowingly and intentionally possessed with intent to distribute a controlled substance analogue, as defined in Title 21, United States Code, Section 802(32), with intent that the controlled substance analogue be used for human consumption, as provided in Title 21, United States Code, Section 813, in violation of Title 21, United States Code Sections 841(a)(1). That violation involved N-ethylpentylone hydrochloride, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 6

[Attempted Possession with Intent to Distribute Heroin]

On or about April 19, 2017, in Onondaga County, in the Northern District of New York, the defendant, **JEFFREY MCALLISTER**, a/k/a Lex, a/k/a L knowingly and intentionally attempted to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 846. That violation involved 100 grams of more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B).

COUNT 7
[Felon in Possession of Firearm and Ammunition]

On or about February 16, 2017, in Onondaga County, in the Northern District of New York, the defendant, **CRAIG MOORE**, having been convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, namely, 1) a conviction in Onondaga County (New York) for Attempted Criminal Possession of a Controlled Substance in the 5th degree, Attempt to Sell (case 92-0700-1), in violation of New York State Penal Law, Section 220.06, a felony, and 2) a conviction in Onondaga County (New York) for Attempted Assault Second Degree with Intent to Cause Physical Injury with Weapon or Instrument, in violation of New York Penal Law Section 212.05 a felony, knowingly possessed in and affecting interstate commerce the following:

- a. a firearm, that is, one (1) Taurus Brasil .22 gauge handgun, Serial Number NY85511, manufactured in the country of Brazil.
- b. one or more rounds of ammunition, that is, thirty-one (31) rounds of Remington .22 gauge ammunition, manufactured outside the state of New York.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

PRIOR FELONY DRUG CONVICTIONS

1. Counts 1 through 6 are re-alleged herein and incorporated by reference.
2. Defendant **MICHAEL WRIGHT** is subject to increased punishment, pursuant to Title 21, United States Code, Section 841(b)(1)(A) because of the following prior convictions for felony drug offenses which have become final: (1) on or about 7/6/93 in Queens County, he was convicted of Criminal Sale of a Controlled Substance in the 5th degree (case N10929-93), in violation of New York State Penal Law, Section 220.31, and on that date was sentenced to 2 to 4

years imprisonment; (2) on or about 2/5/92 in Queens County, he was convicted of Criminal Sale of a Controlled Substance in the 5th degree (case N11279-92), in violation of New York State Penal Law, Section 220.31, and on that date was sentenced to 2 to 4 years imprisonment; and (3) on or about 3/28/90 in Queens County, he was convicted of Criminal Possession of a Narcotic Drug in the 4th degree (case N11279-92), a felony, in violation of New York State Penal Law, Section 220.09, and on that date was sentenced to 5 years probation, and was thereafter re-sentenced to 1 year imprisonment on 3/23/92 for violation of probation, and 4) on or about 7/14/89, in Queens County, New York, he was convicted of Criminal Possession of a Controlled Substance in the 5th degree (case D3148-89), in violation of New York Penal Law 220.06, and on that date was sentenced 18 months Probation.

3. Defendant JEFFREY MCALLISTER is subject to increased punishment, pursuant to Title 21, United States Code, Section 841(b)(1)(A) because of the following prior convictions for felony drug offenses which have become final: (1) on or about 12/04/04, in Onondaga County, he was convicted of Criminal Possession of a Controlled Substance in the 3rd Degree With Intent to Sell (case 2004-0359), in violation of New York Penal Law 220.16, subsection 1, and on that date was sentenced to 150 months to 25 years imprisonment, which sentence on 10/13/09 was reduced to 102 months, (2) on or about 2/18/99, in Queens County, he was convicted of Criminal Possession of a Controlled Substance in the 3rd Degree With Intent to Sell (case N10038-99), in violation of New York Penal Law 220.16, subsection 1, and on that date was sentenced to 54 months to 9 years imprisonment, (3) on or about 9/20/93, in Queens County, he was convicted of Criminal Possession of a Controlled Substance in the 5th Degree With Intent to Sell (case N12304-93), in violation of New York Penal Law 220.06, subsection 1, and on that date was sentenced to 18 months to 3 years imprisonment, (4) on or about 11/16/90, in

Queens County, he was convicted of Attempted Sale of a Controlled Substance in the 4th Degree (case N12192-93), in violation of New York Penal Law 220.34, and on that date was sentenced to 2 to 4 years imprisonment, and (5) on or about 5/16/90, in Queens County, he was convicted of Criminal Sale of a Controlled Substance in the 5th Degree (case N10603-90), in violation of New York Penal Law 220.31, subsection 1, and on that date was sentenced to 1 to 3 years imprisonment.

4. Defendant CURTIS JAMISON is subject to increased punishment, pursuant to Title 21, United States Code, Section 841(b)(1)(B) because of the following prior convictions for felony drug offenses which have become final: 1) on or about 8/8/07, in Onondaga County, he was convicted of Criminal Possession of a Controlled Substance in the 4th Degree (case 2007-0581-1), in violation of New York Penal Law 220.09, and on that date was sentenced to 42 months imprisonment, and 2) on or about 11/15/05, in Cayuga County, he was convicted of Criminal Sale of a Controlled Substance in the 5th degree (case 05-0906), in violation of New York State Penal Law, Section 220.31, and on that date was sentenced to 3 years imprisonment; 3) on or about 9/7/05, in Onondaga County, he was convicted of Attempted Criminal Possession Controlled Substance 5th Degree (case 2004-0082-1), in violation of New York Penal Law 220.06, and on that date was sentenced to 18 months to 3 years imprisonment.

5. Defendant CRAIG MOORE is subject to increased punishment, pursuant to Title 21, United States Code, Section 841(b)(1)(B) because of the following prior conviction for a felony drug offense which has become final: 1) on or about 10/8/92, in Onondaga County, he was convicted Attempted Criminal Possession of a Controlled Substance in the 5th degree, Attempt to Sell (case 92-0700-1), in violation of New York State Penal Law, Section 220.06, and on that date was sentenced to 1 year imprisonment.

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Six of this indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of offenses in violation of Title 21, United States Code, Sections 841 and 846, the defendants, **MICHAEL WRIGHT, MICHAEL SKINNER, a/k/a P, JEFFREY MCALLISTER, a/k/a Lex, CRAIG MOORE, and CURTIS JAMISON** shall forfeit to the United States of America any property constituting, and derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, and intended to be used, in any manner and part, to commit, and to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

A. **Money Judgment:**

A money judgment equal to the value of the unrecovered proceeds obtained by each defendant:

- (i). **MICHAEL WRIGHT**, not less than \$750,000
- (ii). **MICHAEL SKINNER, a/k/a P**, not less than \$1,000,000
- (iii). **JEFFREY MCALLISTER, a/k/a Lex**, not less than \$500,000
- (iv). **CRAIG MOORE**, not less than \$250,000
- (v). **CURTIS JAMISON**, not less than \$250,000

B. **Personal Property:**

Any property used, and intended to be used, in any manner or part, to commit, and to facilitate the commission of the offense.

3. If any of the property described above, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: October 18, 2017

A TRUE BILL,


Grand Jury Foreperson

GRANT C. JAQUITH
Acting United States Attorney

By: 
Carl G. Eurenus
Assistant United States Attorney
Bar Roll No. 511746

ATTACHMENT B

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
Northern District of New York

United States of America

v.

Case No. 5:17-CR-

323 (BAS)

MICHAEL SKINNER, A/K/A P.

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) MICHAEL SKINNER, A/K/A P
 who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Conspiracy to possess with intent to distribute heroin, furanyl fentanyl and controlled substance analogues, in violation of Title 21, United States Code, Sections 841(a)(1) and 846; and Possession with intent to distribute furanyl fentanyl or controlled substance analogues, in violation of Title 21, United States Code, Section 841(a)(1)

Date: 10/18/2017


Issuing officer's signature

City and state: Syracuse, New York

Hon. Andrew T. Baxter, United States Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title